

Exhibit A

From: Stromberg, Daniel <dstromberg@outtengolden.com>
Sent: Tuesday, January 9, 2018 6:09 PM
To: Engelman, Keri L.; McNerney, Christopher; Miazad, Ossai; Schrum-Herrera, Cristina
Cc: Evans, Paul C.
Subject: RE: Millien, et al. v. Madison Square Garden Company - Defendant's Document Production

Hi again Keri,

To add to the below, several of these documents were exported to illegible images. For the most part, the pages at issue look to be screenshots of application pages. I'd imagine these come from a database, and a preferable method of production would be some sort of database export. It probably makes sense to discuss this and the below issues, along with the documents with redactions, since we don't believe that's necessary given the parties' protective order.

Please let us know when you are able to chat over the next week.

Thanks,
Dan

Daniel Stromberg
202-847-4406

From: Stromberg, Daniel
Sent: Tuesday, January 9, 2018 9:55 AM
To: 'Engelman, Keri L.' <keri.engelman@morganlewis.com>; McNerney, Christopher <cmcnerney@outtengolden.com>; Miazad, Ossai <OM@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumberrera@outtengolden.com>
Cc: Evans, Paul C. <paul.evans@morganlewis.com>
Subject: RE: Millien, et al. v. Madison Square Garden Company - Defendant's Document Production

Hi Keri,

Thank you for the production on 1/5. We have had a chance to review, and it looks like there are some technical issues and deficiencies that do not comply with our ESI stipulation. A minor issue is that more than the required load file formats were included. This is obviously not a problem, but bears mentioning as the stipulation is specific.

More importantly, many of the documents produced a) seem to be PDF exports of ESI, b) are missing vital metadata that is included in the stip, and c) contain metadata that pertain to the PDF of the file, rather than the original file itself. This last category includes inaccurate custodian designations of "MSG".

We ask that you please re-produce these files consistent with the ESI stipulation. When sufficient, a metadata overlay with the pertinent metadata for the original ESI is acceptable.

Let me know if it makes sense to have a call to discuss.

Thanks,
Dan

From: Engelman, Keri L. [<mailto:keri.engelman@morganlewis.com>]
Sent: Friday, January 5, 2018 6:52 PM
To: McNerney, Christopher <cmcnerney@outtengolden.com>; Miazad, Ossai <om@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumberrera@outtengolden.com>

Cc: Evans, Paul C. <paul.evans@morganlewis.com>

Subject: Millien, et al. v. Madison Square Garden Company - Defendant's Document Production

Counsel,

Please see the attached correspondence.

The password to access the production file sent via secure file transfer is: MLBCMMSG01052018!

Thanks,

Keri

Keri L. Engelman

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